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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**EUGENE DIVISION**

**CASCADIA WILDLANDS,**

**Case No. 6:22-cv-00767-AA**

Plaintiff,

v.

**CHERYL ADCOCK; PAUL  
TIGAN; and U.S. BUREAU OF  
LAND MANAGEMENT,**

Defendants,

and

**AMERICAN FOREST  
RESOURCE  
COUNCIL,**

Defendant-Intervenor.

**DEFENDANTS' UNOPPOSED  
MOTION TO EXPAND WORD  
COUNT FOR COMBINED  
MEMORANDUM IN SUPPORT  
OF CROSS-MOTION FOR  
SUMMARY JUDGMENT/IN  
RESPONSE TO PLAINTIFF'S  
MOTION FOR SUMMARY  
JUDGMENT**

Defendants make this unopposed motion to expand the word count to a maximum of 13,000 words for their combined memorandum in support of cross-motion for summary judgment/in response to Plaintiff's motion for summary judgment. Pursuant to LR 7-1(a), undersigned counsel conferred with Plaintiff's counsel, and Plaintiff does not oppose this motion.

There is good cause to grant this unopposed motion. By April 26, 2024, Defendants plan to file a cross-motion for summary judgment in this action, along with a combined memorandum in support of their cross-motion and in response to Plaintiff's motion for summary judgment. *See* ECF 40 (current case briefing schedule). Although the default word-count allowance is 11,000 words for this memorandum, LR 7-2(b), an expansion to a 13,000-word maximum is appropriate here. In their memorandum, Defendants will not only be providing the relevant factual backdrop but will be addressing various legal points on a variety of environmental-law contentions, both in support of their motion and in response to Plaintiff's motion. The requested expansion will allow Defendants' memorandum to appropriately address these points.

For these reasons, this Court should grant this unopposed request to expand the word count to a maximum of 13,000 words for Defendants' combined summary judgment memorandum.

Dated this 19<sup>th</sup> day of April, 2024.

Respectfully submitted,

NATALIE K. WIGHT  
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/s/ Sean E. Martin  
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